

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DAVID E. KAPLAN, et al., Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

- against -

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.
-----X

No. 12 Civ. 9350 (NRB) (KNF)

NOTICE OF PLAINTIFFS' MOTION FOR CLASS DISTRIBUTION ORDER

PLEASE TAKE NOTICE that Class Representatives Chi Pin Hsu, Gary W. Muensterman and Fred M. Ross, and Lead Plaintiffs David E. Kaplan and Michael S. Allen, will move this Court, at a date and time to be determined by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 23(e): (1) approving the administrative determinations of the claims administrator accepting and rejecting claims submitted in connection with the settlement of the above-captioned action; (2) directing distribution of the net settlement fund to authorized claimants in the amounts calculated by the claims administrator; (3) authorizing procedures for an initial distribution and second distribution to authorized claimants, followed by the donation of any remaining settlement funds to certain specified public charities; (4) approving payment to the claims administrator of its fees and the costs of administration; and (5) authorizing destruction of paper and electronic copies of claim forms and related documentation following the completion of settlement administration.

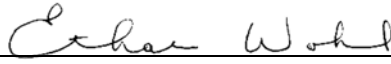
The grounds for this motion are set forth in the accompanying memorandum of law, and it is made upon the Declarations of Eric Schachter dated March 19, 2018 and Ethan D. Wohl

dated March 21, 2018, the exhibits annexed thereto, all prior pleadings and proceedings had herein, and such other written or oral argument as may be directed by the Court.

Dated: New York, New York
March 21, 2018

WOHL & FRUCHTER LLP

Marc I. Gross
Michele S. Carino
POMERANTZ LLP
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665

By: 
Ethan D. Wohl
Krista T. Rosen
Sara J. Wigmore
570 Lexington Avenue, 16th Floor
New York, New York 10022
Telephone: (212) 758-4000
Facsimile: (212) 758-4004

Class Counsel and Attorneys for Plaintiffs